

PATTI AND RUSTY RUEFF SCHOOL OF VISUAL AND PERFORMING ARTS

Department of Theatre

October 10, 2017

Chairman Ajit Pai Commissioner Mignon Clyburn Commissioner Michael O'Rielly Commissioner Brendan Carr Commissioner Jessica Rosenworcel

c/o Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

As a professor of Theatre Sound at Purdue University in West Lafayette IN, that provides dozens of performances per year to thousands of audience members and education programs to hundreds of students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. We serve the students of Purdue University and our local communities, and contribute to the national and international performing arts. Through the performing arts, we educate and engage, research and discover, imagine and create, all in order to explore the human condition. Personally, I am a Fellow of the United States Institute of Theatre Technology, and the 2017 recipient of the Distinguished Achievement Award in Sound.

I strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. I support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

I urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;



- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

We use wireless microphones in our musicals, wireless in-ear monitors for our orchestra members, wireless headset systems for our backstage communications, and wireless control devices in our stage hardware, lighting and sound control devices. We are a small program with an outstanding reputation for placing students in our industry. Most importantly, we have small budgets, so whenever the FCC changes the requirements for wireless communications, we find ourselves between an impossible rock and a hard place: do we stop training students for the real world, because the equipment that we've recently purchased is no longer legal? We are still dealing with the ramifications of the move out of the 700 MHz band, a move that cost us well over \$10,000 dollars. I am pretty sure that we are not alone in the entertainment, worship, sports, etc., communities when we suggest that we simply cannot afford these seismic shifts in our methods of operation.

Please work to create a system that does not bankrupt education and the small business community of worship, entertainment, sports, etc.

Sincerely,

Richard K. Thomas

Professor of Visual and Performing Arts

Sound Design and Technology

Richard X. Thomas

Purdue University Theatre

552 West Wood Street, Room 2184

Purdue University

W Lafavette IN 47907

(765) 494-8150 Office

(765) 496-1766 FAX

zounds@purdue.edu